

## REMARKS

Reconsideration of the rejections under Section 103 is respectfully solicited.

In numbered paragraph 1 of the Official Action on page 2, the Examiner notes that Applicant argues the use of module systems and that the module systems comprise insertion elements.

It is also noted by the Examiner that Henington et al does not provide more than one conveying member or at least 2 conveying members. Applicant's claim 1 also requires that the insertion elements are alternatively comprised of at least one treatment device or an ensemble of at least one conveying member and at least one treatment device.

It is further noted that the Examiner has acknowledged that Henington et al does not provide more than one conveying member or at least two conveying members located as recited, but the Examiner has determined that there must be established a criticality of a need for a plurality of conveying members, and presumably also for the insertion elements when they require at least one treatment device or an ensemble of at least one conveying member and at least one treatment device.

It is the Examiner's position that the difference between Henington et al and the claims of Applicant involve a mere matter of duplication of parts. That is not the case. As was set forth in the remarks submitted with the amendment of October 21, 2008, starting with the middle of page 8 thereof, the present invention provides a flexibility and permits ready utilization of different transport systems without involving major expense and without having the carrier elements needing to be re-adapted each time a change has to be performed in the treatment unit. As was further explained in those remarks, Henington et al would seem to necessarily require reconstruction every time a unit is to be re-adapted from, for example, handling a thicker material, to handling a thinner, more flexible material, by either cutting additional slots or changing the sidewalls to accommodate different units, resulting in delay in the manufacturing and additional expense.

This is further explained on page 9 of the previous response to the Official Action, line 22 through page 10 line 5.

Also, the specification fully supports this change-over feature that is enabled by the structure set forth in the claims. See page 4 of the specification, last paragraph through page 7 line 8, for example.

It should thus be clear that this invention as recited in the claims is not a mere matter of duplication of parts as stated by the Examiner in paragraph 2 on page 2 of the Official Action, nor is there the “motivation” that is suggested by the Examiner on page 3 of the Official Action, paragraph 5 lines 12-14.

In that portion of the Official Action the Examiner has stated:

“The motivation to provide a plurality of conveying members is to increase the throughput. Thus, it would have been obvious for one of ordinary skill in the art to duplicate the conveying members of Henington et al in order to increase the throughput.”

The invention here, with the instant application, is not to increase the throughput. It is to provide versatility and adaptability as has been explained, that can readily be effected without requiring machining and construction of parts as it would be in Henington et al.

Thus, it is submitted that, relative to Henington et al, Applicant here has invented a treatment unit which does produce a new and unexpected result.

By providing the insertion elements according to the present invention, it is possible to have the insertion elements carry all functions which are required to process the workpieces in the treatment unit (i.e. conveying members and treatment device and other elements).

Treatment units like Henington et al must be designed depending on the type of the workpieces that are to be handled. The construction of the treatment units according to the present invention comprises carrier elements which are all the same, regardless of the type of workpieces being worked upon.

In accordance with the present invention it is only necessary that the insertion elements be selected for whatever specific treatment is desired for the workpiece. Thus there is a standardization of the treatment units that offers greater flexibility in construction, manufacturing and retrofitting of the treatment devices, because the insertion elements can be designed according to the needs, and readily replaced depending upon which features are desired for the insertion elements, as dictated by whatever workpieces are being worked upon. The present

invention helps enormously in cost reduction, because the carrier elements in the treatment units of the invention may be constructed identically, irrespective of the type, size and/or thickness of the workpieces that are to be processed.

For example if one is retrofitting a treatment unit from a previous processing of thick boards in accordance with the present invention, to thereafter process thin foils, such retrofitting can be made very efficiently and quickly in accordance with the present invention by simply exchanging the respective insertion elements required for the new workpieces. The processing of thick boards requires a relatively large distance between the axels of the conveying members, whereas the foils requires a small distance between these axels.

In accordance with the present invention, the treatment units that are used for foil can carry a plurality of conveying members, not for purposes of increasing throughput, but to keep the thin foils horizontal in their path of travel, whereas the perhaps previously treated thicker workpieces may have had, as part of their insertion element a single conveying member and a treatment unit.

Conventional treatment units like Henington et al have been constructed such that remodeling of the treatment unit is required in such circumstances. Such remodeling would normally involve removing the carrier elements having large distances between the recesses and installing other carrier elements which have small distances between the recesses. It should be apparent that such remodeling would involve a substantial reconstruction of the unit with the attendance higher manpower costs to make the changes on site.

In accordance with the present invention, there is no remodeling of that type required to the carrier elements. Rather, the change over from insertion elements which comprise conveying members and/or treatment devise at a large pitch (or distance apart in the longitudinal direction) to insertion elements which comprise the conveying members and/or treatment devices at a small pitch is sufficient to adapt to processing thin foils instead of the previously processed thick boards. This change over may very easily and efficiently be effected by simply pulling out the insertion elements designed for processing the thick boards and inserting the insertion elements which are designed for processing thin foils.

There is an additional advantage in accordance with the present invention, because, unlike Henington et al, it is no longer necessary to have one recess for each conveying member. Rather, one recess can now be used to accommodate a group of conveying members, which

allows smaller distances between the axels of these conveying members, a feature which is especially important when the workpiece is a thin foil.

In view the above comments, reconsideration is requested, in that while the Examiner has acknowledged the differences between Henington et al and the claims of the instant application, these differences are very significant, and are not a mere duplication of parts, and produce the new and unexpected result addressed above.

With respect to the rejections of some of the dependent claims over Henington et al in view of Pender and Haas et al, these rejections are likewise traversed for the same reasons as addressed above, because neither Pender nor Haas et al are addressed to the claim features that are recited in the independent claims of this application, and which are absent also from Pender and Haas et al.

Reconsideration and an early allowance of the application are respectfully solicited.